

EXHIBIT A

Sullivan v. Selene

Person	Date	Services Rendered	Time	Hourly Rate	Billed Amount
Nick Yousif	1.8.16	Client stopped by office. Collection case. He has been informed by his mortgage holder that they claim he has missed 2 payments. He never missed a payment according to his records. Will have to review full years of bank statements. Mtg co has stopped accepting his payments and are threatening foreclosure.	1.1	\$ 450.00	\$ 495.00
Nick Yousif	1.13.16	Brief review of file determining whether they are showing missed payments	0.5	\$ 450.00	\$ 225.00
Nick Yousif	1.13.16	Review with client. Need proof that he made the payments. Client to get bank statements	0.3	\$ 450.00	\$ 135.00
Nick Yousif	1.14.16	Spoke to client. He said he would get us the documents and drop them off today	0.3	\$ 450.00	\$ 135.00
Nick Yousif	2.2.16	Client getting more collection calls from mtg co. He will tell them he retained an attorney. Thorough review of 5 years of bank statements	6.2	\$ 450.00	\$ 2,790.00
Nick Yousif	2.4.16	Fee agreement prep. Client coming in at 5 to sign	0.2	\$ 450.00	\$ 90.00
Nick Yousif	2.4.16	Review of case with client in person. Reviewed the claims that Rushmore stated they were missing mtg payments but the statements show them. Also appears they misapplied his loan modification payments	1.1	\$ 450.00	\$ 495.00
Nick Yousif	2.5.16	Sent POA to Selene. Asked client to gather any letters regarding a loan mod and trial payments around Dec 2009. Also asked for statements if he has them for Jan, Feb, Mar 2010	0.5	\$ 450.00	\$ 225.00
Nick Yousif	2.5.16	Reviewed case with office. Left voicemail for David Chami to see how he wants to handle case.	0.3	\$ 450.00	\$ 135.00
Nick Yousif	2.16.16	Spoke to client who is looking for an update. Told him we're looking at a potential second claim with David Chami. Asked him to check to confirm he never received documents regarding trial plan	0.3	\$ 450.00	\$ 135.00

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Nick Yousif	03/03/16	Reviewed and sent copies of docs to David Chami	0.5	450	\$ 225.00
Nick Yousif	3.31.16	Met with Mr. Sullivan. He brought numerous documents to my office to review including letters from Mortgage servicers and collection letters from Selene. Brought in BK records and loan mod and dozens of letters and what appeared to be cancelled checks. Reviewed the information and called David Chami to consult as the fact pattern looked complicated. Was advised to obtain bank records to confirm checks were all actually cashed by the various mortgage servicers including Selene.	3.1	\$ 450.00	\$ 1,395.00
Nick Yousif	4.4.16	Met with Mr. Sullivan who now had all letters, checks and bank statements. Went through 6 years of bank statements and confirmed all checks were delivered and cashed. Confirmed Selene was incorrectly reporting on Credit Report and prepared file for co-counsel agreement with Chami	8.3	\$ 450.00	\$ 3,735.00
Nick Yousif	4.7.16	Selene called looking for intent of client. Told them he wants to retain property. Review of case with client and David Chami	1	\$ 450.00	\$ 450.00
Nick Yousif	4.11.16	Review with client. Selene bringing foreclosure action. Need to touch base with David Chami. Client is paying taxes on house now.	0.5	\$ 450.00	\$ 225.00
David Chami	4.18.16	Spoke with Nick Yousif in greater detail about prosecutive case for Robert Sullivan. Reviewed general issues/timeline. Asked Nick to Send the gathered evidence including bank statements, cancelled checks etc to review and confirm story by PC	0.7	\$ 550.00	\$ 385.00
Nick Yousif	4.19.16	Meeting with client and phone call with David Chami. Chami to begin drafting letter and docs	1	\$ 450.00	\$ 450.00

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David Chami	5.2.16	Received documents including credit reports, bank statements, letters and cancelled checks from Nick Y for Robert Sullivan. Performed detailed review of docs.	6.8	\$ 550.00	\$ 3,740.00
David Chami	5.3.16	Went back through documents and determined that a possible FDCPA claim existed. Did some preliminary research and discussed possibility of getting credit reports with Client. Believed it was unlikely at the time they were reporting due to age of the delinquency but thought it made sense to check	3.6	\$ 550.00	\$ 1,980.00
Nick Yousif	05/20/16	Received, reviewed and sent foreclosure notice from Korde and Associates to Chami	0.3	450	\$ 135.00
David Chami	5.20.16	Received Letter from Nick's office regarding Notice of intent to foreclose on behalf of Selene; reviewed letter and prepared response	4.1	\$ 550.00	\$ 2,255.00
David Chami	5.25.16	Assisted Mr. Sullivan with obtaining credit reports from all three credit reporting agencies. Reviewed the reports in detail and identified issues with Selene reporting on the Experian Report. Then reviewed an Innovis report (mortgages) to see if Selene was reporting on that report. Prepared gameplan for disputes to Experian re: Selene Account	5.1	\$ 550.00	\$ 2,805.00
David Chami	6.20.16	Received Experian dispute response re: Selene tradeline reporting balance and late payments. Reviewed response and analyzed claims under 1681s-2b	3	\$ 550.00	\$ 1,650.00
David Chami	6.24.16	Began reviewing first circuit authority for s-2b claim.	4.1	\$ 550.00	\$ 2,255.00
David Chami	6.27.16	Continued reviewing authority. Reviewed Chiang and DeAndrade decisions in detail. Reviewed Plaintiff's claim in light of those cases and determined it was appropriate to continue review and pursuit of an FCRA claim	4.6	\$ 550.00	\$ 2,530.00
Nick Yousif	6.28.16	Client looking for update. Texted Chami to see where we're at	0.3	\$ 450.00	\$ 135.00

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David Chami	6.28.16	Compared and contrasted out of circuit authority. Reviewed case specific facts and determined it was a claim we could pursue	4.9	\$ 550.00	\$ 2,695.00
David Chami	7.7.16	Prepared retainer between Mr. Sullivan and Nick's office with PLG/Chami. Reviewed with Nick and forwarded to Mr. Sullivan	0.8	\$ 550.00	\$ 440.00
Florence Lirato	7.14.16	Took call from client re: moving forward with his case. Explained attorney review and setup a call with Mr. Chami about next steps	0.5	\$ 150.00	\$ 75.00
Florence Lirato	7.15.16	Created File for Mr. Sullivan. Saved relevant documents and created accounting profile for new client. Documents were extensive. Sent Retainer to Mr. Chami to review and edit.	1.7	\$ 150.00	\$ 255.00
David Chami	7.18.16	Discussion with Nick Y regarding the case. Explained that we would be preparing the draft complaint for his review and comments.	0.8	\$ 550.00	\$ 440.00
Florence Lirato	7.19.16	Received signed retainer and filed	0.2	\$ 150.00	\$ 30.00
David Chami	7.26.16	Began putting together draft complaint. Went through letters between Sullivan and prior loan servicers to track payments, alleged shortages, tax deferrals from the county to put together a detailed complaint. Fact patters is highly complex requiring attention to detail.	7.4	\$ 550.00	\$ 4,070.00
David Chami	7.27.16	Continued working on complaint until I got into a format that appeared to be filable.	6.9	\$ 550.00	\$ 3,795.00
Nick Yousif	8.4.16	Spoke to client who was looking for an update. Notified him that Price Law Group should be filing suit. Reviewed case with David Chami and client	1	\$ 450.00	\$ 450.00
David Chami	8.9.16	Email with Mr. Sullivan. Many questions regarding communications with loan servicers to better understand his claims against Selene who was reporting the balance as owing and currently late. Setup call for 8.10.16	0.8	\$ 550.00	\$ 440.00

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David Chami	8.10.16	Call with Mr. Sullivan to discuss facts/allegations as well as his damages.	0.8	\$ 550.00	\$ 440.00
David Chami	8.11.16	Received email from Client including a copy of his Chapter 13 and subsequent Chap 7 BK Petitions. Reviewed them in detail. Reached out to both BK lawyers to discuss facts.	4.5	\$ 550.00	\$ 2,475.00
David Chami	8.11-12.16	Began thorough review of all monthly mortgage statements, bank statements, accompanying letters, loan modification, BK docs and collection letters to verify allegations in the complaint and confirm that Selene account information was inaccurate.	7.8	\$ 550.00	\$ 4,290.00
David Chami	8.12.16	Continued preparation of complaint	3.1	\$ 550.00	\$ 1,705.00
David Chami	8.15.16	Draft Complaint prepared	4.5	\$ 550.00	\$ 2,475.00
David Chami	8.15.16	Reviewed Draft complaint with Mr. Sullivan	1.6	\$ 550.00	\$ 880.00
David Chami	8.17.16	Complaint Reviewed and prepared for filing	3.9	\$ 550.00	\$ 2,145.00
Florence Lirato	8.23.16	Prepared Civil case initiating Documents for all Def.	1.2	\$ 150.00	\$ 180.00
Florence Lirato	8.23.16	Filed Complaint and saved docs	0.4	\$ 150.00	\$ 60.00
Florence Lirato	8.30.16	Sent Selene initiating Docs	0.2	\$ 150.00	\$ 30.00
Nick Yousif	9.29.16	Carol from Selene Finance called – trying to determine status of case and looking for us to call back. Wanted us to submit a loan modification package because client is behind	0.3	\$ 450.00	\$ 135.00
Nick Yousif	10/31/16	Email exchange with Attorney Paul Michienzie for Selene. Him and Chami will set up call. They want more time to file an answer	0.2	450	\$ 90.00
David Chami	10.31.16	Received email from Paul Michienzie for Selene. Discussed complaint, requested a stipulation to extend the deadline to file a responsive pleading	0.8	\$ 550.00	\$ 440.00
David Chami	11.14.16	Spoke to Paul about settlement options including loan modification to allow Mr. Sullivan to remain in the home. Selene was unresponsive but requested a second extension to file an answer. Granted.	0.7	\$ 550.00	\$ 385.00

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Nick Yousif	11/16/21	Atty Michienzie's office sent request to extend time to file answer. Confirmed that is alright. Numerous other email exchanges	0.4	450	\$ 180.00
David Chami	11.17.16	Received draft motion to extend from Selene's counsel.	0.3	\$ 550.00	\$ 165.00
David Chami	12.5.16	Received and reviewed Selene's answer to Complaint. Discussed improper affirmative Defenses and failures to affirmatively respond to straightforward factual allegations.	4.1	\$ 550.00	\$ 2,255.00
David Chami	1.3.17	Prepared motion for admission pro hac vice. Consulted with Defendants. No objections	1.2	\$ 550.00	\$ 660.00
Nick Yousif	1.3.17	Review of Atty Chami's pro hac application. Needs to be filed	0.2	450	\$ 90.00
David Chami	1.4.17	Call with Selene's counsel about settlement	0.8	\$ 550.00	\$ 440.00
Florence Lirato	1.4.17	Filed motion for admission pro hac vice	0.2	\$ 150.00	\$ 30.00
David Chami	Jan-17	Reached out to counsel about setting Rule 26(f) conf. no response	0.1	\$ 550.00	\$ 55.00
David Chami	Feb-17	Reached out to counsel about setting Rule 26(f) conf. was told that no Rule 16 set so no hurry to hold 26(f)	0.1	\$ 550.00	\$ 55.00
Florence Lirato	Feb-17	Reached out to Court to figure out when the Rule 16 conference would be set - no date provided	0.1	\$ 150.00	\$ 15.00
Nick Yousif	3.16.17	Emailed Chami for update. He got back to me. Updated client	0.3	\$ 450.00	\$ 135.00
David Chami	Apr-17	Reached out to counsel about setting Rule 26(f) conf.	0.1	\$ 550.00	\$ 55.00
David Chami	May-17	Multiple conversations with Defendants about need to set 26(f) meeting a start discovery despite no Rule 16 conference being set. Demanded we hold a 26(f) meet and confer	0.4	\$ 550.00	\$ 220.00

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Nick Yousif	06/05/17	Court has not scheduled rule 16 conference yet. Tried to call court to see what's happening. Chami said his office has been calling as well	0.4	450	\$ 180.00
David Chami	6.16.17	Prepared Rule 26(f) report to be circulated amongst Defendants	1.3	\$ 550.00	\$ 715.00
David Chami	6.20.17	Reviewed report and Attended Rule 26(f) meeting - reviewed edits by Defendants	1.2	\$ 550.00	\$ 660.00
David Chami	6.21.17	Received and reviewed notice of appearance of Selene's counsel Richard Demerle. Performed initial research on counsel including speaking to Nick Yousif who had past experiences with Mr. Demerle.	1.2	\$ 550.00	\$ 660.00
Nick Yousif	06/27/21	Review of Rule 16 joint statement	0.4	450	\$ 180.00
David Chami	6.28.17	Communication with Richard Demerle - new counsel for Selene. Selene attempted to delay holding of a 26(f) conference based on the lack of a scheduled Rule 16 conference	1	\$ 550.00	\$ 550.00
David Chami	6.28.17	Began preparing written discovery to Selene. RFAs and RFPs completed	5.6	\$ 550.00	\$ 3,080.00
David Chami	6.29.17	Prepared ROGs to serve on Selene. Finalized RFAs and RFPs.	4.3	\$ 550.00	\$ 2,365.00
Florence Lirato	6.29.17	Printed and mailed discovery to Selene	0.3	\$ 150.00	\$ 45.00
Florence Lirato	7.3.17	Emailed written discovery to Selene	0.2	\$ 150.00	\$ 30.00
Nick Yousif	07/11/17	Follow up email correspondence to file Rule 16 report	0.2	450	\$ 90.00
Nick Yousif	07/21/17	Updates to Joint statement. Reviewed	0.2	450	\$ 90.00

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David Chami	7.21.17	Reviewed scheduling order and discussed document review and deposition schedule	1.2	\$ 550.00	\$ 660.00
Florence Lirato	7.24.17	Filed Joint Statement regarding scheduling conference	0.2	\$ 150.00	\$ 30.00
David Chami	7.25.17	Received email from Selene's counsel requesting Extension of discovery to August 18. Reviewed email and considering time invested to date agreed to an extension to August 9th 2017.	0.5	\$ 550.00	\$ 275.00
David Chami	8.7.17	Received email from Selene's attorney requesting an extension to August 14 to submit discovery. Reviewed response and granted the request as a professional courtesy.	0.3	\$ 550.00	\$ 165.00
David Chami	8.13.17	Received multiple emails from Selene's counsel requesting an additional 24 hours to respond to discovery. Reviewed the emails, responded granting another ext.	0.3	\$ 550.00	\$ 165.00
Nick Yousif	08/15/17	Selene got us discovery. Review of Selene's answer to interrogatories and request for admissions	1.8	450	\$ 810.00
David Chami	8.15.17	Received discovery responses - performed cursory review	1.6	\$ 550.00	\$ 880.00
David Chami	8.16.17	Reviewed discovery responses. Major deficiencies began outlining a meet and confer related to numerous deficient responses	4.9	\$ 550.00	\$ 2,695.00
David Chami	8.18.17	Received and reviewed Selene's 26.1 disclosure	1.1	\$ 550.00	\$ 605.00
David Chami	8.25.17	Prepared Rule 26.1 IDS to send to Defendants	1.2	\$ 550.00	\$ 660.00
David Chami	9.7.17	Continued meet and confer letter regarding Selene's deficient discovery responses and requested supplemental responses	3	\$ 550.00	\$ 1,650.00
David Chami	9.15.17	Received an email threatening a motion for summary judgment. No response to meet and confer letter	0.5	\$ 550.00	\$ 275.00

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David Chami	9.20.17	Call from Demerle where he tried to explain why our claims would all fail - appeared to not understand the FCRA or FDCPA. He explained his primary practice was in Bankruptcy	0.8	\$ 550.00	\$ 440.00
David Chami	9.21.17	Sent Demerle email summarizing the call on the 20th as well as case law establishing that any motion he would file would be futile since he is not following the law on the claims asserted.	1.5	\$ 550.00	\$ 825.00
David Chami	9.21.17	Received email from Demerle which appeared to be a preview of his impending motion for summary judgment. Examined his alleged authority	2.3	\$ 550.00	\$ 1,265.00
David Chami	10.04.17	Received an email from the court regarding scheduling conference with the Court. Reviewed calendar and responded to Courtroom deputy	0.4	\$ 550.00	\$ 220.00
Nick Yousif	10.13.17	Client dropped off docs dated Oct 2 for David. Scanned in server and email to Chami. In depth client meeting reviewing docs with client. Reviewed with Chami	3.1	\$ 450.00	\$ 1,395.00
David Chami	10.15.17	Performed research for discovery motion. Prepared motion to compel discovery following unsuccessful meet and confer with Selene	7.1	\$ 550.00	\$ 3,905.00
David Chami	10.16.17	Continued drafting motion to compel and got it into a final form.	5.2	\$ 550.00	\$ 2,860.00
Florence Lirato	10.17.17	Prepared exhibits and documents to file motion to compel and served on Def. Selene by mail and email	1.1	\$ 150.00	\$ 165.00
Nick Yousif	10.24.17	Client received statement from Selene stating he has 49k of arrears. Reviewed with client and sent statement to Chami	0.4	\$ 450.00	\$ 180.00
David Chami	10.24.17	Communicated through multiple emails with Demerle to meet and confer on motion to compel. Scheduled a call for 10/25	0.4	\$ 550.00	\$ 220.00

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David Chami	10.25.17	Call with Demerle. He explained that he would not supplement any discovery until the Court ruled on his client's motion for summary judgment that had not even been filed. He sent a confirming email to that effect on 10.30.17 which is included in this time	1.1	\$ 550.00	\$ 605.00
David Chami	11.2-3.17	Received Selene's MSJ. Reviewed in detail including preliminary review of the authorities cited	5.7	\$ 550.00	\$ 3,135.00
David Chami	11.3.17	Continued review of purported case law that supported Selene's position. Read cases and Shepardized cases to seek out positive and negative citations	4.1	\$ 550.00	\$ 2,255.00
David Chami	11.2.17	Prepared status report per court order to be filed by 11.3.17	0.3	\$ 550.00	\$ 165.00
David Chami	11.3.17	Prepared for call with Court re: motion to compel. Call held on 11.3 with Judge Kelley. Motion granted	4.2	\$ 550.00	\$ 2,310.00
David Chami	11.5.17	Began draft of opposition to motion for summary judgment. Reviewing disputed facts and preparing factual background for opposition. Call with the client and Nick Yousif	6.5	\$ 550.00	\$ 3,575.00
Nick Yousif	11.5.17	Reviewed MSJ and Participated in call with client and Chami re: MSJ	3.2	\$ 450.00	\$ 1,440.00
David Chami	11.7.17	Came in on Saturday to work on legal research on FCRA/FDCPA claims. Counsel relied on BK court cases. Needed to review and distinguish for brief. Began a rough draft of the opposition	10.2	\$ 550.00	\$ 5,610.00
David Chami	11.9.17	Reviewed amended JOINT statement re: scheduling conference	0.3	\$ 550.00	\$ 165.00
Nick Yousif	11.9.17	Reviewed amended JOINT statement re: scheduling conference	0.2	\$ 450.00	\$ 90.00
David Chami	11.17.17	Reviewed protective order for entry in the case. Suggested edits	1.8	\$ 550.00	\$ 990.00
David Chami	11.17.17	Multiple emails with Demerle regarding another extension for discovery after the court ordered production	0.4	\$ 550.00	\$ 220.00

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David Chami	11.20.17	Received and reviewed Court order granting another ext for Selene to respond to discovery	0.2	\$	550.00	\$	110.00
Florence Lirato	11.20.17	Sent order to Chami and Yousif and saved in file	0.1	\$	150.00	\$	15.00
David Chami	11.30.17	Reviewed edited PO suggested further changes which were assented to and PO was filed with the court.	1	\$	550.00	\$	550.00
Florence Lirato	12.04.17	Downloaded and reviewed/saved Order re: PO	0.3	\$	150.00	\$	45.00
David Chami	1.11.18	Draft notice of 30(b)(6) depo including topics	1.5	\$	600.00	\$	900.00
David Chami	1.15.18	emails with Demerle requesting dates for Depo	0.3	\$	600.00	\$	180.00
David Chami	1.15.18	Re-worked intro and factual statements on MSJ	2.3	\$	600.00	\$	1,380.00
David Chami	1.18.18	emails with Demerle advising he was looking into dates and provides possible settlement options that offer no payment to Plaintiff	0.4	\$	600.00	\$	240.00
David Chami	1.24.18	email regarind MSJ and need to take deposition to complete MSJ	0.3	\$	600.00	\$	180.00
Florence Lirato	2.2.18	Stipulation to extend discovery	0.3	\$	175.00	\$	52.50
David Chami	2.5.18	Discussed stipulation with Selene re: ext of time to respond to MSJ. Prepared Stip and filed with the Court on 2.7.18 - summary judgment response date moved to 3.15.18	1	\$	600.00	\$	600.00
Nick Yousif	2.6.18	Reviewed 1099 and how it works with client	0.2	\$	500.00	\$	100.00
Florence Lirato	2.8.18	Received and filed granting of ext re: discovery	0.2	\$	175.00	\$	35.00
David Chami	2.14.18	Began a review of Selene production of documents including ROG responses to prepare for Deposition	6.7	\$	600.00	\$	4,020.00
David Chami	2.15.18	Continued reviewing document production by Selene. Looked for support for additional claims and considered BK disclaimers (boilerplate) on collection letters. Performed some legal research on that issue as it was related to summary judgment	5.9	\$	600.00	\$	3,540.00
David Chami	2.16.18	Prepared annotated exhibits and outline for Selene's corporate rep depo	9.1	\$	600.00	\$	5,460.00
David Chami	2.25.18	Final Depo prep. Depo Set for 2.28.18	2.8	\$	600.00	\$	1,680.00

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David Chami	2.27.18	Flight to Boston to take depo of Jessica Edwards. Reviewed depo exhibits and outline - reworked outline to better setup possible need to read in. Organized to make sure read in would flow well for jury	8.3	\$ 600.00	\$ 4,980.00
David Chami	2.28.18	Reviewed outline and traveled to depo location in Boston. Continued review, appeared at location and conducted depo of Selene's rep Jessica Edwards - actual time 3 hours of depo	5.2	\$ 600.00	\$ 3,120.00
David Chami	3.2.18	Sent email to Demerle re: Settlement after taking depo. Selene's witness made numerous admissions that Demerle ignored and rejected our offer to settle.	0.5	\$ 600.00	\$ 300.00
David Chami	3.6.18	Continued working on opposition to MSJ. Modified statement of facts and added additional case law	6.7	\$ 600.00	\$ 4,020.00
David Chami	3.13.18	Finalized Motion for Summary Judgment and prepared for final review/filing	4.8	\$ 600.00	\$ 2,880.00
Florence Lirato	3.14.18	Filed MSJ Opposition, organized exhibits and sent to Selene by US mail and email.	0.8	\$ 175.00	\$ 140.00
David Chami	4.3.18	Prepared amended notice of deposition for Selene with topics	1.4	\$ 600.00	\$ 840.00
Florence Lirato	4.4.18	Sent 2nd Amended notice of depo to Selene	0.3	\$ 175.00	\$ 52.50
Florence Lirato	4.6.18	Sent notice of depo for Cathy Oliver for May 4, 2018	0.3	\$ 175.00	\$ 52.50
David Chami	4.13.18	Reviewed discovery requests received from Selene. RFA responses prepared	4.7	\$ 600.00	\$ 2,820.00
David Chami	4.13.18	Reviewed and prepared discovery responses to Selene's RFPs including objections. Spoke to Mr. Sullivan and reviewed his doc production in 2016 to identify proper redactions for confidential or privileged information	6.8	\$ 600.00	\$ 4,080.00
David Chami	4.17.18	Finalized RFP responses	1.7	\$ 600.00	\$ 1,020.00

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David Chami	4.18.18	Reviewed Mr. Sullivan's attempts to answer Selene's ROG responses. Reviewed them and provided guidance to Mr. Sullivan to better understand the ROG's. Placed objections and formatted basic responses pending further input from Plaintiff	5.7	\$ 600.00	\$ 3,420.00
David Chami	4.25.18	Reviewed final discovery responses including ROG's and obtained verification page from Sullivan.	2.1	\$ 600.00	\$ 1,260.00
Florence Lirato	4.27.18	Prepared and sent discovery responses to Selene - mail and email	0.4	\$ 175.00	\$ 70.00
David Chami	4.30.18	Prepared for and participated in a discovery call with the Court related to Selene's refusal to agree to a deposition of Cathy Oliver. Court granted our discovery motion	3.2	\$ 600.00	\$ 1,920.00
David Chami	5.15.18	Parties agreed to extend discovery to allow Plaintiff to complete Oliver depo at a later date. Ext. filed with the court.	0.8	\$ 600.00	\$ 480.00
Florence Lirato	5.31.18	Received, reviewed and filed order granting discovery ext. Modified system to reflect new dates	0.4	\$ 175.00	\$ 70.00
David Chami	6.25.18	Reviewed court's order setting oral argument on MSJ for 7.12.18	0.2	\$ 600.00	\$ 120.00
David Chami	7.11.18	Prepared for oral argument on MSJ. Reviewed briefs and prepared outline of arguments.	6.2	\$ 600.00	\$ 3,720.00
David Chami	7.12.18	Reviewed outline and conducted oral argument on MSJ. Court requested additional briefing on FDCPA bankruptcy disclaimer	2.8	\$ 600.00	\$ 1,680.00
David Chami	7.26.18	Reviewed order assigning to mediation	0.2	\$ 600.00	\$ 120.00
David Chami	7.26.18	Discussed with Nick Yousif to schedule attendance at mediation and review with client	0.3	\$ 600.00	\$ 180.00
Nick Yousif	7.26.18	Discussed mediation with Chami and client	0.3	\$ 500.00	\$ 150.00
David Chami	8.5-6.18	Prepared for depo of Cathy Oliver. Reviewed transcript of Jessica Edwards, reviewed doc production and created outline for depo.	7.8	\$ 600.00	\$ 4,680.00

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David Chami	8.7.18	Travel to take the depo of Cathy Oliver. Reviewed outline during flight and while waiting at the airport. Cross referenced depo of Edwards for possible impeachment	4.6	\$	600.00	\$	2,760.00
David Chami	8.8.18	Reviewed exhibits and took depo of Cathy Oliver	3.3	\$	600.00	\$	1,980.00
David Chami	8.22.18	Received and reviewed depo transcript of Cathy Oliver	2.3	\$	600.00	\$	1,380.00
David Chami	8.24.18	Received discovery requests from Selene seeking settlement documents from Plaintiff. Performed extensive research on the propriety of the request in the country and specifically in the 1st circuit.	4.8	\$	600.00	\$	2,880.00
David Chami	9.5.18	Prepared mediation statement for 9.17.18 mediation	3.6	\$	600.00	\$	2,160.00
Florence Lirato	9.12.18	Communications with the Court regarding mediation	0.3	\$	175.00	\$	52.50
David Chami	9.12.18	Prepared client for depo set for 9.18.18 (Defendant eventually cancelled the depo)	2.5	\$	600.00	\$	1,500.00
David Chami	9.14.18	Demerle emails requested settlement agreements with other defendants - email responses and phone calls in or on 9.14-15.18	0.9	\$	600.00	\$	540.00
David Chami	9.15.18	Travel to Boston, met with client and Nick Yousif to go over the case, facts and settlement positions.	5.8	\$	600.00	\$	3,480.00
Nick Yousif	9.15.18	Met with Chami and client to discuss case/settlement	2.6	\$	450.00	\$	1,170.00
David Chami	9.17.18	Participated in mediation with Magistrate judge	1.5	\$	600.00	\$	900.00
Nick Yousif	9.17.18	Participated in mediation with Magistrate Judge	1.5	\$	450.00	\$	675.00
Florence Lirato	9.20.18	Requested hearing transcript from the court reporter	0.3	\$	175.00	\$	52.50
Nick Yousif	9.24.18	Review of document client received in the mail from Selene with client. Sent copy to Chami	0.8	\$	500.00	\$	400.00
Florence Lirato	9.24.18	Prepared and emailed/mailed Plaintiff's third supplemental disclosure	1	\$	175.00	\$	175.00
David Chami	9.27.18	Reviewed order allowing renewed motion for summary judgment filed by Selene	0.2	\$	600.00	\$	120.00
David Chami	9.27.18	Received Defendants request for a discovery conference regarding settlement agreements with other defendants	0.3	\$	600.00	\$	180.00

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Nick Yousif	10.2.18	Review of more docs client received from Selene. Client said he will mail Chami a copy	0.6	\$	500.00	\$	300.00
Florence Lirato	10.4.18	Prepared and emailed/mailed Plaintiff's Fourth Supplemental disclosure	0.4	\$	175.00	\$	70.00
David Chami	10.05.18	Reviewed renewed msj - reviewed for modifications made. Read in detail including exhibits and declarations - refreshed recollection on general authority relied upon	4.8	\$	600.00	\$	2,880.00
David Chami	10.15.18	Reviewed previously filed opposition made modifications, including additional testimony from depositions of Selene's staff and submitted to staff for filing and supplemental briefing	8.4	\$	600.00	\$	5,040.00
Florence Lirato	10.19.18	Prepared filing of opposition to msj	0.4	\$	175.00	\$	70.00
Florence Lirato	10.29.18	Received notice of hearing and set for attorney to appear	0.2	\$	175.00	\$	35.00
David Chami	11.6.18	Discovery conference held. Reviewed case law and prepared for argument on the discovery issue. Selene's motion was denied	2.8	\$	600.00	\$	1,680.00
Florence Lirato	12.31.18	Received motion to compel filed by Selene.	0.2	\$	175.00	\$	35.00
David Chami	1.4.19	Reviewed motion to compel filed by Selene. Performed preliminary review and outlined opposition. Began case law review and looking for competing authority	4.5	\$	675.00	\$	3,037.50
David Chami	1.10.19	Briefed opposition to motion to compel	6.3	\$	675.00	\$	4,252.50
David Chami	4.8.19	Received and reviewed the court's order denying Selene's motion to compel	1	\$	675.00	\$	675.00
David Chami	4.24.19	Spoke to Mr. Sullivan about the case and provided update.	0.4	\$	675.00	\$	270.00
David Chami	7.2.19	Received Court's report and recommendation on MSJ. Reviewed order and citations in preparation for objection by Defendant	2.4	\$	675.00	\$	1,620.00
David Chami	7.16.19	Received objection to report and recommendation filed by Selene. Read once for content.	2.9	\$	675.00	\$	1,957.50
David Chami	7.19.19	Prepared reply to Defendants objection to R&R.	4.9	\$	675.00	\$	3,307.50
David Chami	7.22.19	Continued and finalized reply to Defendants objection	5.1	\$	675.00	\$	3,442.50
Florence Lirato	7.25.19	prepared reply to Defendants objection to R&R and filed	0.8	\$	175.00	\$	140.00

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David Chami	8.1.19	Call with client and Nick Yousif to discuss case status. Client was very concerned with the length of time since filing and requested that we try to expedite case	1.2	\$ 675.00	\$ 810.00
Nick Yousif	8.1.19	Call with Client and David Chami to discuss case status	1.2	\$ 500.00	\$ 600.00
Nick Yousif	8.15.19	Sent Chami escrow notice	0.2	\$ 500.00	\$ 100.00
David Chami	9.24.19	Reviewed motion to amend order to grant permission to appeal. Performed legal research as to the propriety of an appeal on an MSJ	2.6	\$ 675.00	\$ 1,755.00
Nick Yousif	1.2.20	Call with client. He has heart problems. Client sent us medicals. Reviewed medicals and sent to Chami	1.2	500	\$ 600.00
David Chami	1.26.20	Received letter from client advising of serious health issues and concerns. Contacted client who seemed to be in good spirits but concerned about health issues. Wanted update about the case but advised we were waiting on the court to rule on the Objection by Defendants	1.3	\$ 675.00	\$ 877.50
Nick Yousif	1.26.20	Spoke to Chami about letter received from Mr. Sullivan	0.5	\$ 500.00	\$ 250.00
David Chami	1.26.20	Discussed case/health issues with Nick Y. Researched possible issues if Mr. Sullivan became incapacitated	2.3	\$ 675.00	\$ 1,552.50
David Chami	2.26.20	Took call from Plaintiff's son advising that Mr. Sullivan was in a coma and had serious concerns about his health. It was unexpected and unknown if he would make it	1	\$ 675.00	\$ 675.00
David Chami	2.27.20	Legal research on estate's ability to proceed with the case. Mr. Sullivan advised his son that he wanted him to fight to keep the home if he did not make it	3.5	\$ 675.00	\$ 2,362.50
David Chami	4.21.20	Received communication that Mr. Sullivan did recover from health issues. His health was still poor but improving	1	\$ 675.00	\$ 675.00

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Nick Yousif	10.14.20	Calls to clerk. Spoke to Mariliz. Waiting for judge to issue order on dockets 126 and 130. Judge is aware and will remind judge	0.3	\$ 500.00	\$ 150.00
David Chami	10.16.20	Notice to the court that Selene had not responded to requests to confer as ordered by the Court	1	\$ 675.00	\$ 675.00
David Chami	10.16.20	Reviewed District Court's order adopting the R&R	1.1	\$ 675.00	\$ 742.50
David Chami	10.29.20	Prepared letter/request for telephonic conference	0.3	\$ 675.00	\$ 202.50
David Chami	11.5.20	Reviewed status report filed by Selene	0.2	\$ 675.00	\$ 135.00
David Chami	11.10.20	Joint report to the court	0.2	\$ 675.00	\$ 135.00
David Chami	11.16.20	Reviewed Court's order denying Selene's motion to amend	0.3	\$ 675.00	\$ 202.50
David Chami	11.18.20	Received and reviewed Selene's notice of appeal and motion for certificate of appealability Doc 145	4.5	\$ 675.00	\$ 3,037.50
David Chami	11.19.20	Research on the appeal which appeared on its face to be improper. Began more in depth research on the motion	5.1	\$ 675.00	\$ 3,442.50
David Chami	11.30.20	Drafted opposition to interlocutory appeal	2.9	\$ 675.00	\$ 1,957.50
David Chami	1.04.21	Received and reviewed order on appealability at Doc 150	2.2	\$ 675.00	\$ 1,485.00
Nick Yousif	1.11.21	Status conference - setting jury trial	0.3	\$ 500.00	\$ 150.00
David Chami	1.11.21	Status conference - setting jury trial	0.3	\$ 675.00	\$ 202.50
David Chami	1.19.21	Communication with John Precobb re: depo of Plaintiff. Agreement that depo would be conducted remotely by zoom with Mr. Sullivan present with Mr. Yousif and Mr. Chami appearing to Defend by video	0.6	\$ 675.00	\$ 405.00
David Chami	1.24.21	Depo Prep call with Mr. Yousif and Mr. Sullivan	1.5	\$ 675.00	\$ 1,012.50
Nick Yousif	1.24.21	Depo Prep call with Mr. Chami and Mr. Sullivan	1.5	\$ 500.00	\$ 750.00
Nick Yousif	1.28.21	Reviewed exhibits provided by Selene for Depo of Robert Sullivan in office	1.8	\$ 500.00	\$ 900.00
David Chami	1.28.21	Reviewed exhibits provided by Selene for Depo of Robert Sullivan remotely by zoom as Chami was defending the deposition	1.9	\$ 675.00	\$ 1,282.50
David Chami	1.29.21	Defended Depo of Robert Sullivan who was in the Law Office of Nick Yousif - includes pre depo discussion with Yousif and client	3.2	\$ 675.00	\$ 2,160.00

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Nick Yousif	1.29.21	Made office available for Depo of Sullivan. Discussed depo with client during breaks and participated in calls with client and Chami who was defending by zoom	3.2	\$	500.00	\$	1,600.00
David Chami	1.29.21	Spoke to Precobb re: continued depo regarding documents that were disclosed but not in Mr. Precobb's possession. Agreed to a limited depo as to the credit reports	0.4	\$	675.00	\$	270.00
David Chami	2.1.21	Emails with Precobb re: scheduling continued depo	0.4	\$	675.00	\$	270.00
David Chami	2.17.21	Emails with Precobb re: additional topic for depo	0.2	\$	675.00	\$	135.00
David Chami	2.18.21	Emails with Precobb re: additional topic for depo	0.3	\$	675.00	\$	202.50
David Chami	2.18.21	Prep Call with Client re: Continued Depo	1.2	\$	675.00	\$	810.00
Nick Yousif	2.18.21	Prep Call with Client re: Continued Depo	1.2	\$	500.00	\$	600.00
David Chami	2.19.21	Continued depo of Sullivan	1.8	\$	675.00	\$	1,215.00
Nick Yousif	2.19.21	Continued depo of Sullivan at Yousif office	1.8	\$	500.00	\$	900.00
Nick Yousif	2.22.21	Email from client with attachments of credit denials. Reviewed with Atty McKenna	0.4	\$	500.00	\$	200.00
David Chami	3.1.21	Multiple emails regarding settlement. No offer actually made to Plaintiff in response to our demands	0.4	\$	675.00	\$	270.00
David Chami	4.6.21	Received referral to ADR... reviewed and prepared brief addressing merits and settlement position following completion of discovery and motion practice	3.1	\$	675.00	\$	2,092.50
David Chami	5.27.21	Spoke to client about home value, possible settlement and efforts to get on the same page about acceptable settlement options	1	\$	675.00	\$	675.00
Nick Yousif	5.27.21	Participated in call with Client and Chami about upcoming settlement conference	1	\$	500.00	\$	500.00
David Chami	5.29.21	Began trial prep work. Reviewed depositions of Selene reps for read designations. Reviewed exhibits for identification in 26(a)(3)	5.8	\$	675.00	\$	3,915.00
David Chami	5.30.21	Continued trial prep. Went through collection letters (many received in 2021 during representation). Identified new BK acknowledgments and new violations by Selene	6.1	\$	675.00	\$	4,117.50

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David Chami	6.1.21	Prepared 26(a)(3) disclosure included depo read ins, exhibits and witness lists	2.6	\$	675.00	\$	1,755.00
David Chami	6.8.21	Reviewed Selene's 26(a)(3) disclosure. Reviewed the disclosed exhibits for content and Prepared objections	4.2	\$	675.00	\$	2,835.00
David Chami	6.14.21	Prepared for and appeared at settlement conference with Client and Yousif	3.1	\$	675.00	\$	2,092.50
Nick Yousif	6.14.21	Appeared at settlement conference with Client and Chami	1.4	\$	500.00	\$	700.00
Nick Yousif	7.8.21	Email to David Chami and Florence Lirato – received paperwork from Selene offering a streamline modification	0.1	\$	500.00	\$	50.00
David Chami	8.3-5.21	Began preparing direct examination of witnesses. Jacob Sullivan, John Sullivan and Dax Grantham BK lawyer. Scheduled calls with all to get better understanding of their knowledge of the facts.	5.4	\$	675.00	\$	3,645.00
David Chami	8.6.21	Prepared direct exam for John Sullivan (Brother)	2.4	\$	675.00	\$	1,620.00
David Chami	8.9.21	Prepared direct exam for Jacob Sullivan (son)	2.3	\$	675.00	\$	1,552.50
David Chami	8.10.21	Prepared direct exam for BK Lawyer	1.5	\$	675.00	\$	1,012.50
David Chami	8.17.21	Prepared direct exam for Plaintiff - multiple phone and zoom calls to prepare	4.8	\$	675.00	\$	3,240.00
Nick Yousif	09/07/21	Client received a loan modification denial letter? Client never applied. Not sure why they didn't send our office the denial	0.3	\$	500.00	\$	150.00
David Chami	9.18.21	Prepared bates labeled exhibits for trial. Reviewed exhibits for use in examinations and cross examinations	6.8	\$	675.00	\$	4,590.00
David Chami	10.8.21	Prepared Motions in Liminie - preclude reference to credit denials that predate dispute letters	8.1	\$	675.00	\$	5,467.50
David Chami	10.9.21	Worked on 2 MILs... preclude discussion of other settlements and any statements that Plaintiff may be obligated on the loan which was discharged in BK	11.3	\$	675.00	\$	7,627.50
David Chami	10.10.21	Began initial draft of Jury instructions. 1st Circuit FCRA	3.8	\$	675.00	\$	2,565.00

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David Chami	10.11.21	Worked on 2 MILS - one to preclude discussion that Plaintiff had not paid a mortgage payment since Selene rejected his payments in 2015, one to preclude Defendant from introducing loan history from other servicers	10.8	\$	675.00	\$	7,290.00
David Chami	10.13.21	Continued research on jury instructions - trial 11/29	2.3	\$	675.00	\$	1,552.50
David Chami	10.20.21	Worked on proposed void dire questions	5	\$	675.00	\$	3,375.00
David Chami	10.21.21	Began working on joint statement of the case and jury instructions	5.9	\$	675.00	\$	3,982.50
David Chami	10.21.22	Met and conferred re: MILs... seemed to agree on stip that Selene would not discuss denials pre dispute. Prepared stip	7.5	\$	675.00	\$	5,062.50
David Chami	10.28.21	Prepared cross examination for Selene witnesses. Prepared impeachment exhibits in the event of false testimony	12.2	\$	675.00	\$	8,235.00
David Chami	10.29.21	Completion of jury instructions - circulated to Nick Yousif for review and comments	6.6	\$	675.00	\$	4,455.00
Florence Lirato	10.29.21	Filed MILs	1	\$	175.00	\$	175.00
David Chami	10.30.21	Final review of jury instructions. Approved for submission to opposing counsel on Monday	1.5	\$	675.00	\$	1,012.50
Nick Yousif	10.30.21	Reviewed jury instructions - made minor edits	1.5	\$	500.00	\$	750.00
David Chami	11.1.21	Receved and reviewed OOJ. Offer did not limit fees in any way. Communiated offer to Plaintiff and discussed - reached out to defendant's counsel about possibility of settling fees - NO RESPONSE	1.5	\$	675.00	\$	1,012.50
David Chami	11.1.21	Received emergency motion from Def to continue deadlines - reviewed and consented to filing as a stip	1.5	\$	675.00	\$	1,012.50
David Chami	11.4.21	Spoke to client and he agreed to accept the OOJ receiving \$30,000 + reasonable fees to his attorneys and taxable costs	1.2	\$	675.00	\$	810.00
David Chami	11.8.21	Joint motion to continue hearing and briefing schedule	1	\$	675.00	\$	675.00
David Chami	12.1.21	Reviewing work on the including that of staff and co-counsel.	4.7	\$	675.00	\$	3,172.50

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David Chami	12.2.21	Began working on Motion for fees and review of Lodestar in Boston/east coast. Reviewed Consumer Attorney fee survey and discussed fees in Boston with a few local attorneys through the NACA listserve.	6.2	\$ 675.00	\$ 4,185.00
David Chami	12.3.21	Performed legal research on lodestar and hourly rates. Reviewed relevant authority and incorporated into draft motion	4.2	\$ 675.00	\$ 2,835.00
David Chami	12.4.21	Prepared declaration in support of fees. Reached out to other consumer lawyers to provide affidavits in support of fees. Further reviewed the consumer lawyer fee survey	5.7	\$ 675.00	\$ 3,847.50
David Chami	12.9.21	Completed motion for fees. Began review of time/billing for lodestar and other recoverable taxable costs	4.8	\$ 675.00	\$ 3,240.00
David Chami	12.10.21	Reached out to Nick Yousif regarding his portion of the fee application. Discussed declaration in support and cross referenced appropriate billing based on lead attorney status.	0.8	\$ 675.00	\$ 540.00
		Total Hours Expended:	618.7	Total Amount Billed:	\$ 365,195.00